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Sent: Tuesday, October 27, 2020 4:42 PM
To: Paz Haynes
Cc: Linda DeBaun
Subject: CDS/CareNation

Paz- to confirm our conversation of earlier today, CDS makes no claim of any security interest in, or ownership of, any of the PPP loan proceeds sitting in account *239. Likewise, based on Jim Davis' (of Chiron) representation today that it was not in the ordinary course of business of Capstone to have third party payors pay funds directly into account 239, CDS has no reason to dispute CareNation's assertion that the balance of funds sitting in account 239 that are not proceeds of the PPP loan are anything but proceeds of CareNation's accounts receivable. Of course, if CDS were to later discover that Davis' recollection was incorrect, then CDS reserves the right to assert a right to recovery of any non-PPP funds paid out of account *239 to CareNation, to the extent that were in fact the Debtor's proceeds of accounts receivable. But since we have no reason to dispute CareNation's assertion at this time, CDS won't object to a modified motion along the lines of what we discussed requesting disbursement of the remaining balances in account 239.

Needless to say, CDS reserves all rights and remedies.

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